

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
	)	
<b>Plaintiff,</b>	)	
v.	)	<b>No. 18 CR 157</b>
	)	
<b>DEON PUGH,</b>	)	<b>Hon. John Z. Lee</b>
	)	
<b>Defendant.</b>	)	

**APPOINTED COUNSEL'S MOTION TO WITHDRAW**

NOW COMES, QUINN A. MICHAELIS and JOSHUA B. ADAMS, appointed to represent DEON PUGH under the Criminal Justice Act, and respectfully moves this Honorable Court to grant them leave to withdraw. In support of this motion Counsels states as follows:

1. Mr. Pugh was charged by superseding information with conspiracy to distribute controlled substances, two counts of distribution of controlled substances, and being a felon in possession of a firearm. Mr. Pugh found guilty after proceeding to bench trial, and now awaits sentencing.
2. On Tuesday, July 5, 2022 the undersigned were contacted by another attorney who indicated that she had been called by Mr. Pugh's family for purposes of representation and intended to visit with him. The undersigned arranged a call with Mr. Pugh for July 14, 2022 to verify whether he would be seeking new counsel. Subsequently, Mr. Pugh's letter of July 7, 2022 was entered on the docket.
3. During the call with Mr. Pugh on July 14, 2022, Mr. Pugh asked the undersigned to withdraw and they agreed.
4. After careful consideration and review of their duties under the *Illinois Rules of Professional Conduct*, and in light of discussions with Mr. Pugh in the past,

culminating on January 18, 2022; and recognizing her duty to confidentiality and to do nothing to adversely affect her client in any way, it is necessary that counsel withdraw.

5. Mr. Pugh may choose to waive the attorney-client privilege as to the reasons why Counsel cannot continue to represent him; but those matters are for him to decide. Nothing in the filing of this motion to withdraw should be construed as an acknowledgement, affirmation, or acquiescence to the veracity of the claims contained in Mr. Crossley's letter to the Court requesting new counsel.
6. Consistent with the circumstances, and in light of the commentary of Rule 1.16 of the *Illinois Rules of Professional Conduct* (Declining and Terminating Representation) counsel can properly say only "professional considerations require termination of the representation."

WHEREFORE, Attorney QUINN A. MICHAELIS and JOSHUA B. ADAMS, respectfully moves this Court to grant her leave to withdraw as the defendant's attorney.

Respectfully submitted,

s/ Quinn A. Michaelis  
Quinn A. Michaelis  
Attorney for DEON PUGH  
73 W. Monroe, Suite 106  
Chicago, IL 60603  
312-714-6920

## **CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2022 I electronically filed the above

### **APPOINTED COUNSEL'S MOTION TO WITHDRAW**

with the Clerk of Court using the CM/ECF system to all listed parties in the case.

Respectfully Submitted on July 15, 2022.

By His Attorney,

s/ Quinn A. Michaelis

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